

Terrance D. Dunmire, Esq. (9964)  
 Law Offices of Terrance D Dunmire  
 8701 E. Vista Bonita Drive, Suite 220  
 Scottsdale, Arizona 85255  
 Phone (602) 264-1300  
 tdunmire@parkwestpartners.com  
 Attorney for Defendants (except Brian and Corrina Colvin)

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF ARIZONA**

Valentino Dimitrov, individually, and on behalf of  
 all others similarly situated;

Plaintiff,

v.

Stavatti Aerospace. Ltd, a Minnesota corporation;  
 Stavatti Aerospace Ltd, a Wyoming corporation;  
 Stavatti Corporation, a Minnesota corporation;  
 Stavatti Immobiliare. Ltd. A Wyoming  
 corporation; Stavatti Niagara, Ltd. A New York  
 corporation; Stavatti Super Fulcrum, Ltd, a  
 Wyoming corporation; Stavatti Ukraine, a  
 Ukrainian business entity; Stavatti Heavy  
 Industries Ltd. a Hawaii corporation; Christopher  
 Beskar and Maja Beskar, husband and wife; Brian  
 Colvin and Corrina Colvin, husband and wife;  
 John Simon and Jean Simon husband and wife ;  
 William Mcewen and Patricia Mcewen, Husband  
 and wife; Rudy Chacon and Jane Doe Chacon.  
 Husband and wife; and DOES 1-10, inclusive

Defendants.

Case No. 2:23-CV-00226-DJH

**STIPULATED MOTION TO  
 EXTEND TIME FOR  
 DEFENDANTS STAVATTI  
 AEROSPACE LTD AND  
 CHRISTOPHER BESKAR  
 TO RESPOND TO  
 PLAINTIFF'S MOTION  
 FOR SUMMARY  
 JUDGMENT**

**(FIRST REQUEST)**

**(Assigned to the Honorable  
 Diane J. Humetewa)**

The undersigned counsel Defendants Stavatti Aerospace LTD and Christopher Beskar's have conferred regarding counsel for Stavatti Aerospace LTD and Christopher Beskar's request for additional time, until September 5, 2025, to respond to Plaintiff's motion for summary judgement and Plaintiff has graciously agreed to stipulate to the extension. Accordingly, they move the court to enter the attached proposed order.

1 RESPECTFULLY SUBMITTED this 28<sup>th</sup> day of August 2025

2  
3 The Law Office of Terrance D. Dunmire

4 BY /s/ Terry Dunmire  
Terrance D. Dunmire

5  
6 Enara Law PLLC

7 BY /s/ Ross Meyer  
8 Ross Meyer

9  
10  
11 \_\_\_\_\_

CERTIFICATE OF SERVICE Terrance Dunmire hereby certifies that  
on this 28<sup>th</sup> day of August 2025, he electronically transmitted the attached document  
to the Clerk's Office using the CM/ECF System for filing, with transmittal of a Notice  
of Electronic Filing to the following CM/ECF registrants:

Ross P, Meyer Esq.  
Enara Law PLLC  
7631 East Greenway Road. Suite B-2  
Scottsdale, Arizona 85260  
[george@enaralaw.com](mailto:george@enaralaw.com)  
Attorney for Plaintiff

Nino Abate. Esq.  
The law Office of Nino Abate. PLC  
300 W. Clarendon Ave., Suite 130  
Phoenix, Arizona 85013  
[nino@abatelaw.com](mailto:nino@abatelaw.com)  
Attorney for Brian and Corrina Colvin

Copy of the forgoing mailed  
this 28th day of August 2025 to:

HONORABLE DIANE J. HUMETEWA  
United States District Court Sandra Day O'Connor US Courthouse. Suite 625  
401 West Washington Street, SPC 81  
Phoenix, Arizona 85003

By: /s/ Terry Dunmire